

14196.00291.378.syw.336199

***IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

JOHN T. ELLINGSWORTH	:	CIVIL ACTION - LAW
	:	
	:	
v.	:	
	:	
	:	JURY TRIAL DEMANDED
HALL'S FAST MOTOR FREIGHT Ind. and d/b/a	:	
HALL'S WAREHOUSE CORP. and d/b/a OAK	:	
TREE TRUCK RENTAL and HALL'S	:	
WAREHOUSE CORP. Ind. & d/b/a HALL'S	:	
FAST MOTOR FREIGHT and OAK TREE	:	
TRUCK RENTAL and CHRISTOPHER JOHNSON	:	NO. 02-CV-3507

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***AFFIDAVIT FOR FILING DEFENDANTS'
NOTICE FOR REMOVAL***

TO THE CLERK:

Please note the attached Affidavit of filing Defendants' Certified copy of Petition for Removal with the Court of Common Pleas of Philadelphia County, Pennsylvania.

***Marshall, Dennehey, Warner,
Coleman & Goggin***

***By: _____
James D. Hilly, Esquire
Attorney for Defendants***

DATE: _____

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA

SS
:

_____, being duly sworn according to law deposes and says that he is filing on behalf of the firm **MARSHALL, DENNEHEY, WARNER, COLEMAN AND GOGGIN**, attorneys for Defendants herein, in the above-entitled action, on the _____ day of _____, 2002, with the Prothonotary of the Court of Common Pleas for Philadelphia County, Pennsylvania, a certified copy of the Defendants' Notice for Removal together with copies of the documents attached thereto by leaving said copies with the Prothonotary of Philadelphia County, Pennsylvania.

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS DAY :

OF , 2002 :

NOTARY PUBLIC

14196.00290.378.syw.336199

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

ATTORNEY FOR: DEFENDANTS

BY: JAMES D. HILLY, ESQUIRE
IDENTIFICATION NO.: 27571
1845 WALNUT STREET – 21ST FLOOR
PHILADELPHIA, PA 19103
(215) 575-2600

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JOHN T. ELLINGSWORTH	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
	:	
v.	:	
	:	
	:	APRIL TERM, 2002
HALL'S FAST MOTOR FREIGHT Ind. and d/b/a	:	
HALL'S WAREHOUSE CORP. and d/b/a OAK	:	
TREE TRUCK RENTAL and HALL'S	:	
WAREHOUSE CORP. Ind. & d/b/a HALL'S	:	
FAST MOTOR FREIGHT and OAK TREE	:	
TRUCK RENTAL and CHRISTOPHER JOHNSON	:	NO. 005252

PRAECIPE TO FILE NOTICE OF REMOVAL

TO THE PROTHONOTARY:

Kindly file the attached certified copy of Defendants' Notice of Removal to the United States District Court for the Eastern District of Pennsylvania of record in the above reference matter.

**Marshall, Dennehey, Warner,
Coleman & Goggin**

By: _____
**James D. Hilly, Esquire
Attorney for Defendants**